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[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GGCC, LLC, Individually and on Behalf of)
All Others Similarly Situated,)
Plaintiff,)
vs.)
DYNAMIC LEDGER SOLUTIONS, INC.,)
et al.,)
Defendants.)

Case No. 3:17-cv-06779-RS

CLASS ACTION

DECLARATION OF DANIELLE S. MYERS
IN SUPPORT OF OPPOSITION OF DAVID
LANG, RYAN COFFEY, AND ALEJANDRO
R. GAVIRIA TO COMPETING MOTIONS
FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF
COUNSEL

DATE: March 1, 2018
TIME: 1:30 p.m.
CTRM: Courtroom 3 (17th Floor)

1 I, DANIELLE S. MYERS, declare as follows:

2 1. I am an attorney licensed to practice before all the courts of the State of California
3 and this Court. I am a member of Robbins Geller Rudman & Dowd LLP, counsel for David Lang,
4 Ryan Coffey, and Alejandro Gaviria, proposed lead plaintiff in the above-captioned action. I make
5 this declaration in support of the Opposition of David Lang, Ryan Coffey, and Alejandro R. Gaviria
6 to Competing Motions for Appointment as Lead Plaintiff and Approval of Selection of Counsel. I
7 have personal knowledge of the matters stated herein and, if called upon, I could and would
8 competently testify thereto.

9 2. Attached are true and correct copies of the following exhibits:

10 Exhibit 1: Arman Anvari's LinkedIn Profile;

11 Exhibit 2: Daniel Cawrey, *How One Law Firm Is Helping Bitcoin Startups Find*
12 *Success*," (July 8, 2014, 12:25 UTC), <https://www.coindesk.com/one-one-firm-helping-bitcoin-startups-find-success>;

13 Exhibit 3: Aaron Stanley, "*Bitcoin Miner Sued for Unregistered Securities After ICO*,"
14 (Jan. 3, 2018 at 14:00 UTC), <https://www.coindesk.com/bitcoin-miner-sued-securities-fraud-ico>;

15 Exhibit 4: *Freedman v. Weatherford Int'l Ltd.*, No. 1:12-cv-02121-LAK, Order
16 (S.D.N.Y. July 10, 2012); and

17 Exhibit 5: *Howard v. Arconic, Inc.*, No. 2:17-cv-01057-MRH, Order (W.D. Pa. Feb. 7,
18 2018).

19 I declare under penalty of perjury that the foregoing is true and correct. Executed on
20 February 8, 2018.

21
22 s/ Danielle S. Myers
DANIELLE S. MYERS

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury that the foregoing is true and correct. Executed on February 8, 2018.

s/ Danielle S. Myers
DANIELLE S. MYERS

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Mailing Information for a Case 3:17-cv-06779-RS GGCC, LLC v. Dynamic Ledger Solutions, Inc. et al**Electronic Mail Notice List**

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)